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SEP - 7 1999

Preliminary Comment on the Revised Draft Programmatic EIS/EIR
CALFED Public Hearing by the Silicon Valley Toxics Coalition

My name is Michael Stanley-Jones. I am senior researcher for the Silicon Valley Toxics Coalition with primary responsibility for representing our Coalition before stakeholder processes dealing with watershed management and water security. For the Coalition, I serve on the County of Santa Clara Pollution Prevention Committee and act as environmental coordinator for CLEAN South Bay in the South San Francisco Bay Cu/Ni Total Maximum Daily Load process. Silicon Valley Toxics Coalition is a 17 year-old non-profit, grassroots organization representing some 8,000 members of South San Francisco Bay communities in the fight for pollution prevention, community health and security, and environmental justice.

The Coalition is an active participant in a number of initiatives devoted to improving environmental and health conditions for communities facing water policy challenges, both in the high-tech region of Silicon Valley and among other California communities impacted by the expansion of the new high-tech industrial economy. Included among these initiatives is the establishment of the Silicon Valley Pollution Prevention Center, which serves as a forum for dialog between industry, government and environmental sectors wrestling with the challenge of creating a viable model of industrial production respectful of our communities environmental health and economic security. Through such national initiatives as Design for Environment and the Campaign for Responsible Technology, the Toxics Coalition has sought to apply lessons learned locally to creating a sustainable future for both the American and the global economy.

Our comments tonight are preliminary in nature, as we intend on extending them when our review of the draft EIS/EIR document is complete. Here we wish to make three general critical points. They concern the themes of 1) water conservation, industrial water efficiency, and pollution prevention; 2) urban representation in CALFED; and 3) environmental justice.

Experience with chemical spills and toxic contamination of drinking water sources in Santa Clara valley led our Coalition to conclude that pollution prevention strategies are necessary for the public health and economic security of our region. Closing the loop in industrial water processes (one measure of industrial water efficiency), has proved to be an economical way of simultaneously reducing consumption of water resources, easing the burden on waste water treatment plants and discharges to the SF Bay estuary, and reducing pollution to the environment from chemical contaminants. We see little in the CALFED draft plan that would promote these ends. The reductions envisaged in the draft from industrial water efficiency measures by 2020 are paltry, a mere 7% over the figure projected were CALFED to do nothing. That's pitiful and does not merit the support of our community. Gains from water efficiency measures should be a leading strategy of industrial regions incorporated into CALFED's bones.

Perhaps this element is missing due to CALFED's apparent disregard for the needs of Northern California's urban communities. We are disappointed so little attention is giving in the draft to urban strategies, and shocked by the estimate we have heard that less than 15% of projected funding for CALFED programs would reach the San Francisco Bay Area. The slogan "Let's Put the Bay Back in the Bay-Delta Program" is increasingly being heard.

Finally, this draft ignores California's underrepresented communities, our ethnic and linguistic minorities, and communities of color. Where are the interpreters representing the Spanish and Vietnamese speaking people of our community? Environmental Justice requires every segment of our multi-ethnic, multi-racial community be given the opportunity and means to participate in government decisions which will impact all of our lives. Until all communities are afforded this opportunity, the CALFED process will lack the legitimacy it seeks to chart California's water future.

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